

Exhibit A – Declaration of Scott Carney

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10 UNITED STATES DISTRICT COURT
11
12 DISTRICT OF NEVADA

13 INTERNATIONAL MARKETS LIVE, INC., a
14 New York corporation; CHRISTOPHER
15 TERRY, an individual;

16 Case No.: 2:18-cv-00187-JAD-GWF

17 Plaintiffs

18 vs.
19 ROBERT HALTERMAN, an individual;
20 SCOTT CARNEY, an individual; ETHAN
21 VANDERBUILT, an individual;
22 Defendants.

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**DECLARATION BY DEFENDANT SCOTT
CARNEY IN SUPPORT OF
MEMORANDUM OF LAW IN SUPPORT
OF
MOTION TO DISMISS PLAINTIFF'S
COMPLAINT**

I, Scott Carney, declare as follows:

1. I live in Miami, Florida, and that is my sole residence.
2. I do not have any businesses in Nevada.
3. I have no offices in Nevada.
4. I own no property in Nevada.
5. I have no employees in Nevada.
6. I have no bank accounts in Nevada.
7. I do not direct or target any activities to Nevada.
8. I do not have any connections to Nevada outside of my legal counsel.

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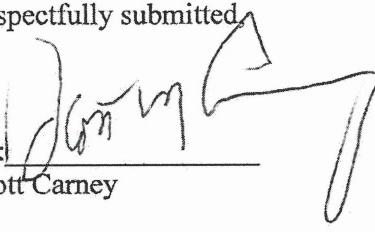
1 9. I am disabled and wheelchair bound, and commuting to court in Las Vegas,
2 Nevada, would be inconvenient for me to attend any hearings or trial.

3 10. No Nevada court has ever found to have personal jurisdiction over me, and I
4 have never been served in Nevada.

5 Pursuant to 28 USC § 1746, I hereby declare under penalty of perjury under the laws
6 of the United States of America that the foregoing is true and correct and is based upon my
7 personal knowledge.

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10 Dated: May 1, 2018

11 Respectfully submitted,

12 By: 
13 Scott Carney

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